



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services Anchorage
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Anchorage, Alaska 99501-2249

APR 3 2002

In Reply Refer to:
WAES

Eric Taylor, Statewide Planning
Alaska Department of Transportation and Public Facilities
3 132 Channel Drive, Room 200
Juneau, AK 99801

Dear Mr. Taylor:

The Alaska Department of Transportation and Public Facilities (ADOT&PF) has initiated a planning process to develop transportation corridors and strategies to improve transportation services in Southwest Alaska. The U.S. Fish and Wildlife Service (Service) appreciates the opportunity to comment on the March 2002 Draft Southwest Alaska Transportation Plan (Plan) prepared for ADOT&PF and anticipates future involvement in final documents and resultant project evaluations.

The Service's recommendations are intended to ensure that our related jurisdiction is understood and that fish and wildlife, their habitats and values, and potential impacts to those values, continue to be represented in this process. Our comments focus on the assumptions presented in the text, and potential impacts on fish, wildlife, and their associated habitats from proposed projects. Where proposed Plan elements include activities we believe could harm fish and wildlife resources, especially in significant habitat areas, general recommendations are provided, with the intent that those projects or impacts be avoided. As Plan elements evolve toward implementation, we expect to provide additional recommendations to ensure such impacts are avoided or minimized, or where necessary, compensated.

Purpose and Need:

The Plan describes the Purpose and Need Statement as:

“To improve intra- and inter- regional connectivity by developing transportation links for access and trade, improving transportation safety, service and flexibility in several measures, and improving transportation efficiency for users and the state. ” (Page 17).

The Service believes the methodology to assess the ***“best overall public interest”*** (Page 16) may have overlooked the interests of an important segment of the public. Most of the lands on the

Alaska Peninsula are in Federal (National Wildlife Refuges (NWR's) and National Parks, including Wilderness areas) or State ownership (State Refuges or Critical Habitat Areas) and many of the social values associated with those public lands are related to the abundant fish and wildlife resources they support. The ADOT&PF should assess the degree of interest of stakeholders who may *not* support the designation of surface transportation corridors in southwest Alaska. The public interest in maintaining the undeveloped and pristine character of southwest Alaska may be significant.

Corridor Delineation and Reservation:

Pacific Coast Marine Corridor:

“Substantial federal funding has been provided for a surface transportation link between King Cove and Cold Bay. Once this surface link is in place, it is thought to be unnecessary for the Tustumena to call at both King Cove and Cold Bay. Accordingly, it is assumed that the Tustumena will call only at King Cove.” (Pages 19 - 20).

We recommend the deletion of the word “surface” from the first two sentences, as this could be misinterpreted as meaning that a ground or road connection is being endorsed. See the Service’s comments on the King Cove-Cold Bay Connection below for our rationale.

This statement does not describe a means by which the Alaska Marine Highway System (AMHS) service is improved or increased to Cold Bay, but rather, assumes Cold Bay to be nonessential, and should therefore be eliminated from any AMHS service altogether. This action would negatively impact the Service as well as the other Federal and State agencies located in Cold Bay.

Izembek NWR would be negatively impacted by the loss of the Tustumena ferry, because the opportunity to attract hundreds of visitors annually would no longer exist. This situation could have cascading negative effects on eco-tourism within the community and within the Aleutians East Borough in general.

Izembek NWR is the primary local tourist attraction and the Refuge office is easily accessible for visitors traveling to Cold Bay on the Tustumena and cruise ships. The Refuge is developing plans to work closely with the onboard Naturalist from the Alaska Maritime NWR (based out of Homer, AK) in providing interpretive programs onboard for passengers riding the ferry. The Refuge is developing interpretive display panels and information kiosks for passengers when they come ashore during brief scheduled stops by the ferry. Finally, the Refuge also plans to provide guided autobus refuge tours for visitors riding the ferry who may be interested in a professionally interpreted experience.

Alaska Peninsula Corridor:

A key element of the Plan is the definition of several transportation corridors for Southwest

Alaska. The discussion of these corridors refers to the “*reservation*” of the corridors to “*establish and protect the surface transportation ‘highways’ that would best serve the region’s long-term social and economic infrastructure needs.*” (Page S-3).

Of concern to the Service are the Chignik to Port Heiden and Chignik to Perryville portions of the Alaska Peninsula Transportation Corridor, which are shown crossing through the heart of the Alaska Peninsula NWR. We believe that the language quoted above implies that publication of a transportation plan by the State of Alaska could somehow “reserve” this corridor, an implication that is seriously misleading.

Construction of surface transportation improvements across refuge lands can only be authorized under a right-of-way permit from the Service. Applications for such permits must be filed under Title XI of the Alaska National Interest Lands Conservation Act, and approval of such an application is by no means guaranteed. The provisions of Title XI require that the Service consider any “economically feasible and prudent” alternative routes, and the National Wildlife Refuge System Improvement Act of 1997 prohibits uses of refuge lands which are not compatible with the purposes for which the Refuge was established, and the mission of the Refuge System as a whole. These Title XI requirements should be addressed in the portion of the Plan which describes the proposed Alaska Peninsula corridor.

In addition, the location of these two portions of the proposed corridor raises the possibility of conflicts with designated Wilderness areas. Although these portions of the proposed corridor do not affect any currently designated Wilderness area, they do conflict with proposed Wilderness areas in two of the four alternatives in the Draft Revised Comprehensive Conservation Plan for the Alaska Peninsula/Becharof NWR, which we expect to publish in the next few months. No road could be constructed across any designated Wilderness areas without explicit Congressional approval.

Cook Inlet to Bristol Bay Corridor:

The Plan presents the concept of a water and land corridor from Williamsport to Naknek and the Bristol Bay region. The proposed corridor would follow the shore of Iliamna Lake from Pile Bay to Igiugig, and then generally follow (and cross) the Kvichak River to Naknek.

The Service would generally oppose this corridor reservation due to its potential primary and secondary impacts to fish and wildlife resources in the Iliamna Lake area. The Iliamna Lake-Kvichak River system is a primary component of the Bristol Bay commercial salmon fishery and is known worldwide as an unequaled sportfishing and hunting destination. With the estimated 127,500 Person Trips in 2020 (Table 12) along the Igiugig - Naknek leg alone, secondary impacts to the Kvichak River area could be significant.

Dillingham - Bristol Bay Corridor:

The Plan describes the concept of a corridor connecting Dillingham, Aleknagik, Levelock, and Naknek once the Cook Inlet to Bristol Bay corridor was constructed. Similar to Service concerns on the other corridor reservations described in the Plan, we would anticipate having direct involvement with the potential development of the corridor where our trust resources could be affected.

Selected Community Linkages:

Kodiak Road to Launch Complex

The Plan shows the improvement of this road beginning near the turnoff for the Kodiak fairgrounds and continuing to the southeast (see Figure S-2; Page S-6). The Service is pursuing a Congressionally mandated land exchange with Koniag, Inc., in which we will be acquiring lands on the south end of Women's Bay. These lands are located along the bay side of the existing highway, and consist primarily of wetlands. The existing road right-of-way forms their upland boundary. As indicated in our above comments where the Plan improvements cross refuge lands, construction of surface transportation improvements across refuge lands can only be authorized under a Title XI right-of-way permit from the Service. If the State should need additional right-of-way from the Service to improve the road, the presence of these wetlands could complicate issuing a right-of-way permit. If feasible, the road should be upgraded within the existing right-of-way.

In addition, failing World War II era and other old or poorly-designed culverts are blocking anadromous fish passage at multiple locations along the existing alignment. We recommend that those deficiencies be corrected if this proposal is carried forward.

Chignik Intertie

The Plan proposes a road linkage be constructed between the villages of Chignik, Chignik Lake and Chignik Lagoon. Although these proposed roads fall within the Alaska Peninsula NWR boundary, it appears from the map in the draft Plan that the roads would be constructed entirely on lands conveyed to one or more Native corporations. If the final route remains entirely on land conveyed out of Federal ownership, no right-of-way permit from the Service would be required. However, if the routing should change so that Federally-owned refuge lands are involved, a permit would be required, as described above.

It is important to note that the Chignik area supports commercially important runs of all five species of Pacific salmon, including a world-class stock of sockeye salmon dependent upon Chignik Lake for spawning and rearing. In addition, over 1,000 Steller's eiders overwinter in Chignik Lagoon, and Anchorage Bay annually. The proposed alignment adjacent to the mudflats in Chignik Lagoon could further impact Steller's eiders by road fill, noise impacts, and increased

exposure to illegal harvest. The Alaska-breeding population of the Steller's eider is listed as threatened under the Federal Endangered Species Act.

King. Cove - Cold Bay Connection

“This plan recognizes the need for a viable and practical surface transportation link between the communities of King Cove and Cold Bay, and endorses the findings of the King Cove - Cold Bay Facilities Concept Report and Assessment of Transportation Need (DOT & PF, 1999). It supports further efforts by both communities to refine and implement a near-term, workable transportation solution. ” (Page S-7).

We recommend the deletion of the word “surface” from the first sentence, as this could be misinterpreted as meaning that a ground or road connection is being endorsed. The 1999 Assessment referenced above recognized that there is a need to improve transportation between the two communities, but not that the link had to be a “surface” or ground link.

The 1999 Assessment and the subsequent Facilities Concept Plan (issued as a draft in February 2000) provide a cursory evaluation of air, marine and overland options. However both reports recognized that in 1998, Congress appropriated \$37.5 million for specific transportation improvements, including \$20 million conveyed to the Aleutians East Borough for a road and marine link between the two communities, improvements to the King Cove airstrip, and improvements to the King Cove medical clinic. Section 353 (a) of the King Cove Health and Safety Act specifically stated that, “In no instance may any part of such road, dock, marine facilities or equipment enter or pass over any land within the Congressionally-designated wilderness in the Izembek National Wildlife Refuge....” This language would exclude an exclusively surface or ground link if the \$20 million is to be applied.

The Aleutians East Borough submitted a Clean Water Act Section 404 permit application to the Corps of Engineers for their proposed road/marine transportation link. The Corps is currently preparing an Environmental Impact Statement under the National Environmental Policy Act evaluating the Borough's proposed transportation project linking the two communities.

Naknek/South Naknek/King Salmon Road Link and Aviation Needs Study

The Plan proposes a bridge and road linking Naknek and South Naknek and an assessment of the need for improvements at individual airport facilities in the region. An improved transportation link between the two communities must recognize the tremendous fishery resources potentially at risk by this project. The Naknek River supports world class runs of anadromous and resident fish and attracts anglers and visitors from around the world. A bridge at this site could spur additional linear residential development along the river, increase the likelihood for fuel spills, and potentially alter local hydrologic patterns in the channel. If ADOT&PF pursues this specific project, the Service expects to actively participate in the evaluation.

The Plan also states that, in reference to an aviation needs study:

“The needs study is not considered a necessary prerequisite for commencing design, engineering, and environmental work on the Naknek bridge project.” (Page S-7).

The Service believes that ADOT&PF would benefit from the completion of a aviation needs study, thereby potentially consolidating airport facilities, and reducing the acreage of potential impacts to wildlife habitat from unnecessary or duplicative airport improvement projects.

Port and Harbor Improvements:

The Plan discusses the need for replacement municipal and AMHS dock facilities in Kodiak (Page S- 13) but does not specify a recommended location. If locations in Gibson Cove or Women’s Bay are considered for new dock facilities, it should be noted that the submerged lands in these areas are part of the Alaska Maritime NWR. Any new dock facilities in these locations would require a right-of-way permit from the Service. However, the Service is pursuing a land exchange with Koniag, Inc. When completed, this exchange will result in the conveyance of some submerged lands within Women’s Bay to Koniag.

The Plan also discusses cellular sheet pile dock facilities at Williamsport, Pile Bay, Chignik, and Unalaska. Use of sheet pile dock structures has a substantially greater environmental impact than a pile supported structure capable of serving the same need. The Service strongly recommends against using large sheetpile cells wherever possible to avoid the complete obliteration of intertidal or lacustrine habitat, alteration of local hydrologic patterns, and disruption of nearshore juvenile fish movements. Due to economies of scale used to justify sheetpile dock structures, those structures are often constructed several times larger than the pile supported structures they are replacing, also at an additional environmental cost.

Validation of Previously Approved and Ongoing “Baseline” Projects:

Dillingham - Aleknagik Road and Wood River Bridge

The bridge connecting Dillingham and Aleknagik over the Wood River is in the permitting phase of development. One of the justifications used for the Wood River bridge included increased access for Aleknagik residents to regional air services in Dillingham. ADOT&PF is currently planning to expand the airport in Aleknagik as soon as 2005, in addition to the bridge project. We recommend that ADOT&PF analyze the transportation needs in this area and consolidate or eliminate those projects that have overlapping goals, in order to minimize the economic and environmental costs of those projects.

Financial Resources, Economy, Population Analysis, and State Responsibility for Maintenance and Operations:

The draft Plan acknowledges the challenges that ADOT&PF faces for State appropriation of

maintenance funds for roadways and airports (pages 62-63). These challenges, coupled with uncertain future oil revenues entering the General Fund, and the tenuous persistence of a fisheries-based economy in southwest Alaska in particular (pages 6-7), should temper any proposal for continued expansion of the existing transportation infrastructure in the region. As we interpret the data presented in the Plan, perhaps the ADOT&PF should also model and present the cost savings and benefits of the proposed projects using *current* census data instead of forecasted demographics (Footnote 1, page 4) as well as *current* data on numbers of fishing boats and volumes of goods requiring transport to Bristol Bay via the Williamsport to Pile Bay route (Appendix B, page 73, Footnote 19) in order to accurately reflect the economic state of southwestern Alaska in 2002. Our concern lies in the State's ability to adequately maintain future facilities and ensure that under-maintained structures (e.g. failing roadbeds affecting water quality or culverts hindering fish passage) would not continue to impact fish and wildlife resources. Similarly, we have concerns that construction of some of the proposed transportation infrastructure would be at a significant environmental and economic cost, yet those facilities would be utilized by fewer than 1% of the Alaska population.

Conclusion:

Our comments and recommendations are intended to inform ADOT&PF planning staff that the Service strives to safeguard the long-term biological sustainability of the Alaska Peninsula ecosystem, and preserve those ecological benefits that citizens of Alaska and the nation value.

Thank you for the opportunity to comment on the draft Plan. We look forward to reviewing the final Plan and participating in the review of any specific proposals that result from these area-wide plans. If you would like to discuss our comments or need additional information, please call me at (907) 271-2787, or Neil Stichert at (907) 271-1777.

Sincerely,



Ann G. Rappoport
Field Supervisor

cc:

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